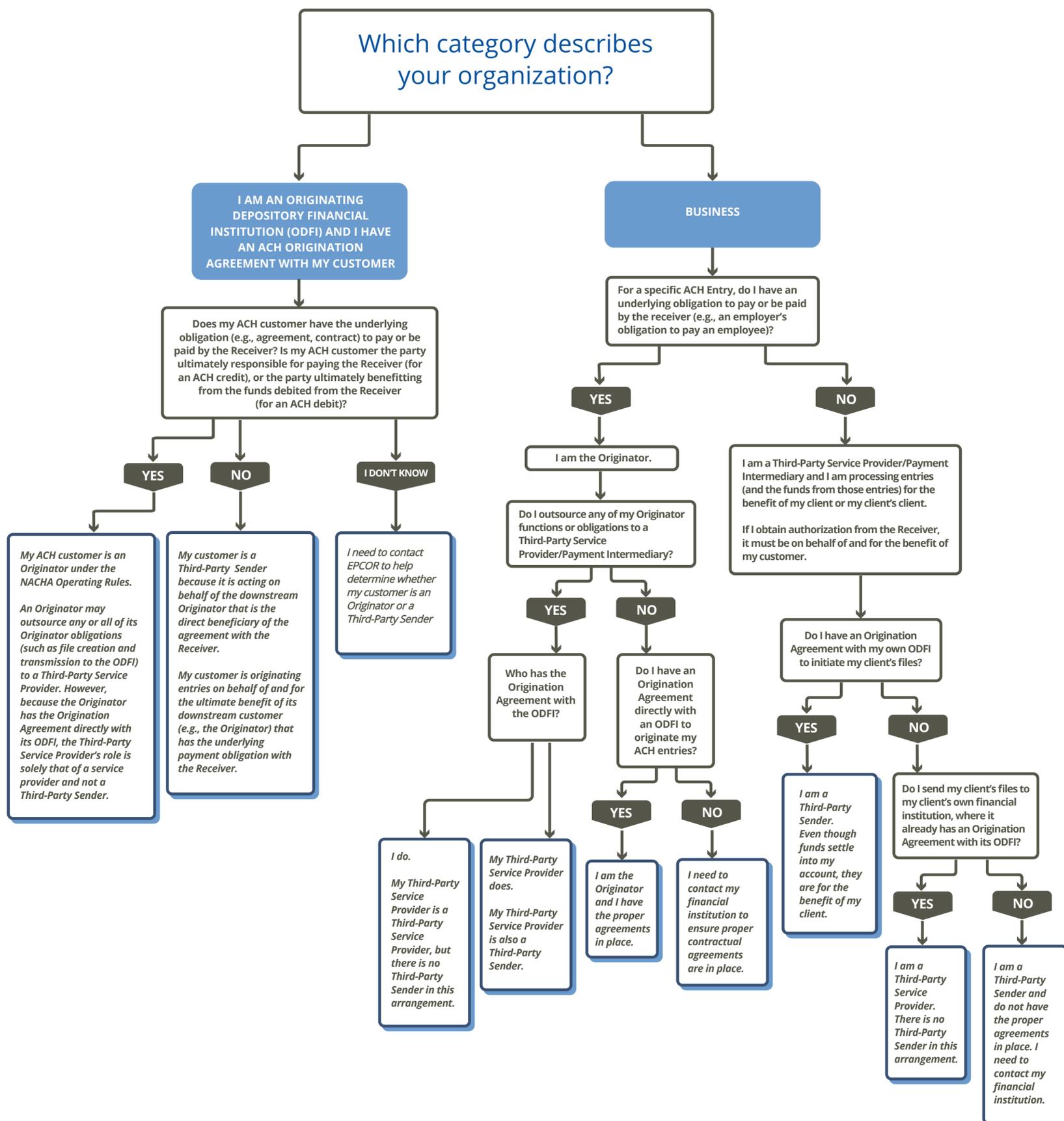


NACHA Third-Party Sender Identification Tool

In most ACH transactions, the roles of the various parties to the transaction – Originator, Receiver, Originating Depository Financial Institution (ODFI), and Receiving Depository Financial Institution (RDFI) – are well-understood (users of this tool that are unfamiliar with these terms are encouraged to consult with their financial institution). However, when a transaction involves the use of a payment intermediary (e.g., a third-party service provider that performs some aspect of payment processing on behalf of a client), those ACH roles may not always be easily identifiable. With the proliferation of new payment models, there is an undefinable amount of business-case scenarios, so documenting them all and the roles associated with each is not possible.

The Third-Party Sender Identification Tool was developed to help ACH participants to understand their roles when an intermediary is involved in some aspect of ACH payment processing. A payment intermediary can fill a variety of roles, depending on the nature of its arrangements with specific customers. ODFIs in particular are required to know the nature of their customers' use of the ACH Network, whether as an Originator, Third-Party Sender, or other type of intermediary.

This Third-Party Sender Identification Tool it is not intended to provide legal advice. Financial institutions are encouraged to obtain their own legal counsel regarding their obligations under the NACHA Operating Rules and other applicable legal requirements.



Other Resources

NACHA's December 2014 ACH Operations Bulletin #2-2014 ACH Transactions Involving Third-Party Senders and Other Payment Intermediaries includes other detailed scenarios.

Article 2, section 2.2.2 of the NACHA Operating Rules for detailed information on ACH Origination Agreements.

For all other questions, please seek legal advice, or contact your financial institution, Regional Payments Association or NACHA.